

**MNL OM&M Plan
USEPA Review Comments
March 2011**

General

1. The specific goals and objectives for the site need to be re-visited, clarified and agreed to before finalizing the OM&M plan. The 'Long-Term Goals and Remedial Objectives' document, which was developed in cooperation with participating agencies and site managers in September 2009, could be a starting point for this discussion among the Agencies and the District. Once established, the OM&M plan should address all agreed upon objectives.
2. Many sections do not reference relevant or corresponding Tables, Figures or Appendices. The entire document should be reviewed closely and references to relevant Tables, Figures or Appendices should be added as much as possible within the text to reinforce important information such as design drawings/information, operating manuals, maintenance schedules, troubleshooting checklists, etc. for system components.
3. This document should include OM&M procedures for the off-site perimeter gas probes as well as the groundwater monitoring network. Will this be addressed in Section 8 / Appendix F? What is the schedule for submission of Section 8 / Appendix F?
4. Make clear in the document who the responsible staff will be for each specific role in the implementation of the OM&M plan. In addition, outline the necessary training needed to properly conduct the activities. State that it will be a requirement that any and all personnel (District or contractors) will be provided access and required to read this document prior to working on the site.

Section 1

1. Provide a schedule (i.e., quarterly, semi-annually, annually) for submission of updated as-builts or OM&M plan modifications which result from changes in site features or system components over the life of the OM&M plan. (Section 1.1, Section 6)
2. The plan objectives should include monitoring of off-site landfill gas probes and groundwater monitoring wells. (Section 1.2, future Section 8?)
3. Provide an overview of site ownership and management and develop a table with staff and management of the Forest Preserve District of DuPage County (or other party) who will be responsible for both oversight and implementation of the OM&M plan. (Section 1.2 & 1.4, page 1-3)

4. Provide a brief description of each Agency authority and responsibilities in oversight of the OM&M Plan. List the relevant contact names and agency contact information into a Table to facilitate easy update of contact information by simple replacement of the Table. (Section 1.4)
5. Provide a larger scale map showing the site location in the general area. In addition, reference Figure 1 within the text after the general description provided of site features. (Section 1.3)
6. Provide a sentence description of each Section of the OM&M plan listed. (Section 1.4)
7. List out or reference a Table with the 'Long-Term Goals and Remedial Objectives' document which was developed in cooperation with participating agencies and site managers in September 2009, or other goals/objectives ultimately decided upon, for the site. (Section 1.2, 1.4, 7.1)
8. State that tracking of performance objectives will be reported as detailed in Section 6 (Section 1.4)
9. Provide a detailed overview of the site background and history which summarizes investigations, construction and monitoring conducted since the landfill closed. Include all activities responsive to Illinois EPA, DuPage County, and/or U.S. EPA inquiries at the site as well as prior installation of probes, vents, drains, cover, etc. (Section 1.5 or a new Section 1.6 – History and Background)
10. Include an inventory or list of all correspondence (letters, orders, permits, licenses, etc) to or from US EPA, Illinois EPA, DuPage County or other local agencies with regards to investigations conducted or actions taken at the site since the landfill closed. (Section 1.5 or a new Section 1.6)

Section 2

1. Reference the forms in Appendix E which will be used to document the inspections, maintenance and troubleshooting to be conducted according to Tables 1-7. (Section 2.1)
2. List out 'agreed upon objectives and goals' which will be used to evaluate the effectiveness of the two separate systems comprising of the LFGCS. (Section 2.2)
3. Reference the appropriate drawings or Figures when describing the blower/flare system (Section 2.2.4) and the leachate collection system (Section 2.3.1).
4. State that design, as-builts, maintenance and monitoring information for the new lift station and forcemain will be included in an update to the OM&M plan. (Section 2.3.1)

5. Add sections which discuss the off-site gas monitoring probes and groundwater monitoring well network (add new Section 2.5 and 2.6?)

Section 3

1. In addition to the overview to be provided in Section 2 (see comment 7 above), provide a brief explanation (with a reference to Figure 1) of the perimeter gas probe monitoring system. (Section 3.1.4)
2. Describe any special considerations or procedures for access and monitoring of the off-site gas probes. (Section 3.1.4)

Section 4

1. For each section, be sure to reference relevant Tables (i.e., schedule for maintenance in Table 2) to reinforce the information in the text.

Section 5

1. Site specific safety plans should include a requirement that at least two workers be present during any site work (i.e., 'buddy system'). (Section 5.1)
2. A requirement that site workers read and/or be familiar with the site OM&M should be included. Consider a requirement that all contractors receive a short 'site safety briefing' from the District or a main contractor so that they are aware of systems and potential hazards. (Section 5.1)
3. Site workers should be HAZWOPR training and be required to have 4-gas meters when working on site. (Section 5.3, 5.5)
4. A discussion of site challenges (potential for trespassers, proximity of school, residents) should be included to raise awareness and heighten sensitivity of workers who may enter the site. (Section 5.1)

Section 6

1. A reporting schedule should be proposed in the document in order to formalize agreement with the Agencies. (Section 6.1)
2. Provide an outline for the OM&M progress report as an Appendix (Section 6.2)

Section 7

1. The goals and objectives (currently in Section 1.2) need to be discussed and clarified before finalizing the overall plan. (see General Comment 1)

2. Discuss criteria for installing additional gas extraction wells in response to high probe readings or additional leachate extraction wells in response to additional/persistent seeps. (Section 2.3.3, 7.2, 7.3)
3. Present criteria for installing a pneumatic leachate pump or when a pump is no longer needed on a well. (Section 2.2.1, Section 7.2.2)

Tables

1. Tables should reference the corresponding Monitoring and Inspection Form (in Appendix E) which will be utilized to document inspections, maintenance or troubleshooting.